

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

IN RE GENWORTH FINANCIAL, INC.,  
SECURITIES LITIGATION

Civ. A. No. 3:14-cv-00682-JAG

Hon. John A. Gibney, Jr.

**CLASS ACTION**

**LEAD PLAINTIFFS' MOTION TO SEAL MEMORANDUM OF LAW AND  
SUPPORTING EXHIBITS IN SUPPORT OF THEIR MOTION FOR PARTIAL  
SUMMARY JUDGMENT**

Lead Plaintiffs Her Majesty the Queen in Right of Alberta and Fresno County Employees' Retirement Association ("Lead Plaintiffs"), by and through their undersigned counsel of record, respectfully move this Court for entry of an Order permitting Lead Plaintiffs to file under seal their Memorandum of Law In Support of Their Motion for Partial Summary Judgment and supporting exhibits.

This Motion to Seal is made pursuant to Local Civil Rule 5(C) and Section 5.2 of the Stipulated Protective Order filed with this Court on June 25, 2015 (ECF No. 85) (the "Protective Order"). The grounds for this Motion to Seal are set forth in the accompanying Memorandum, filed today. The documents and information supporting Lead Plaintiffs' Memorandum of Law In Support of Their Motion for Partial Summary Judgment contain materials that Defendants have designated as Confidential Discovery Material. Pursuant to Section 5.2 of the Protective Order, such materials shall be filed under seal as an initial matter.

DATED: February 12, 2016

/s/ Susan R. Podolsky

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 12, 2016, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

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